

Terrestrial Animal Health Standards Commission Report

September 2007

USA Comments

CHAPTER 1.3.2.

GUIDELINES FOR IMPORT RISK ANALYSIS

Article 1.3.2.1.

Introduction

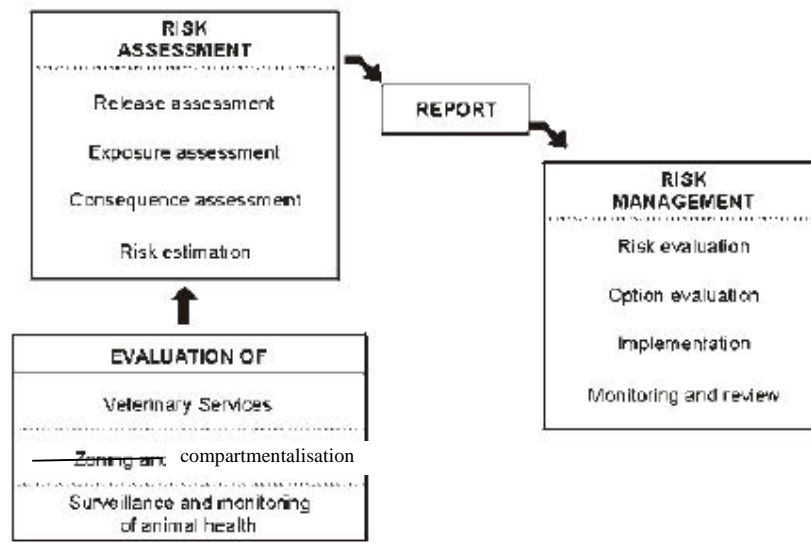
An import risk analysis begins with a description of the *commodity* proposed for import and the likely annual quantity of trade. It must be recognised that whilst an accurate estimate of the anticipated quantity of trade is desirable to incorporate into the risk estimate, it may not be readily available, particularly where such trade is new.

Hazard identification is an essential step which must be conducted before the *risk assessment*.

The *risk assessment* process consists of four interrelated steps. These steps clarify the stages of the *risk assessment*, describing them in terms of the events necessary for the identified potential *risk(s)* to occur, and facilitate understanding and evaluation of the outputs. The product is the *risk assessment* report which is used in *risk communication* and *risk management*.

The relationships between *risk assessment* and *risk management* processes are outlined in Figure 1.

Fig. 1. The relationship between risk assessment and risk management processes



Comment: In Figure 1, above, in the “Evaluation of” box, it is not clear whether a word is being proposed for deletion or not. Regardless of this, both words, namely, “Zoning” and “Compartmentalization” should be included in the box of Figure 1 as both concepts are important in the risk analysis process.

...

Article 1.3.2.3.

Principles of risk assessment

1. *Risk assessment* should be flexible to deal with the complexity of real life situations. No single method is applicable in all cases. *Risk assessment* must be able to accommodate the variety of animal *commodities*, the multiple *hazards* that may be identified with an importation and the specificity of each *disease*, detection and surveillance systems, exposure scenarios and types and amounts of data and information.
2. Both *qualitative risk assessment* and *quantitative risk assessment* methods are valid.

Comment: It is suggested that this point 2) of this Article develop some language or provide information on the circumstances for when one type of risk assessment method (qualitative vs. quantitative) would be preferred over the other.

Article 1.3.2.4.

Risk assessment steps1. Release assessment

Release assessment consists of describing the biological pathway(s) necessary for an importation activity to 'release' (that is, introduce) pathogenic agents into a particular environment, and estimating the probability of that complete process occurring, either qualitatively (in words) or quantitatively (as a numerical estimate). The release assessment describes the probability of the 'release' of each of the potential *hazards* (the pathogenic agents) under each specified set of conditions with respect to amounts and timing, and how these might change as a result of various actions, events or measures. Examples of the kind of inputs that may be required in the release assessment are:

a) Biological factors

- species, age and breed of animals
- agent predilection sites
- vaccination, testing, treatment and quarantine.

b) Country factors

- incidence/prevalence
- evaluation of *Veterinary Services*, surveillance and control programmes, and zoning and compartmentalization systems of the *exporting country*.

Comment: Suggest adding the word compartmentalization for Code consistency.

c) Commodity factors

- quantity of *commodity* to be imported
- ease of contamination
- effect of processing
- effect of storage and transport.

If the release assessment demonstrates no significant *risk*, the *risk assessment* concludess.

...

Article 1.3.2.5.

Principles of risk management

1. Risk ~~assessment~~ management is the process of deciding upon and implementing measures to achieve the Member Country's appropriate level of protection, whilst at the same time ensuring that negative effects on trade are minimised. The objective is to manage *risk* appropriately to ensure that a balance is achieved between a country's desire to minimise the likelihood or frequency of *disease* incursions and their consequences and its desire to import *commodities* and fulfil its obligations under *international trade* agreements.

Comment/rationale: Under this section, should it not be risk “management” rather than risk ‘assessment’?

...